

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*, §  
Plaintiffs, §  
VS. § CIVIL ACTION NO. 2:13-CV-00193  
RICK PERRY, *et al.*, §  
Defendants. §

**EXHIBIT E**

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, ET AL, ) CIVIL ACTION  
Plaintiffs, ) NO. 2:13-CV-00193  
V. )  
RICK PERRY, ET AL, )  
Defendants. )

\*\*\*\*\*

ORAL DEPOSITION OF

GABRIEL RAMON SANCHEZ, Ph.D.

AUGUST 25, 2014

\*\*\*\*\*

ORAL DEPOSITION OF GABRIEL RAMON SANCHEZ, Ph.D.,  
produced as a witness at the instance of the  
DEFENDANTS, and duly sworn, was taken in the  
above-styled and numbered cause on the 25th of August,  
2014, from 9:09 a.m. to 3:06 p.m., before Tamara  
Vinson, CSR in and for the State of Texas, reported by  
machine shorthand, at Matthiesen & Associates, 511  
Lovett Boulevard, Houston, Texas, 77006, pursuant to  
the Federal Rules of Civil Procedure and the  
provisions stated on the record or attached hereto.

1 respondents they felt that was a burden.

2       **Q. Well, so what was the percentage that felt**  
3 **that was a burden?**

4       A.    Actually, a pretty large percentage. I'll  
5 tell you in a second.

6                    MR. DUNN: When you get to a stopping  
7 point, I need to go to the men's room, if that's all  
8 right with you.

9                    MR. SCOTT: Check for tarantulas.

10                  MR. DUNN: Okay.

11       A.    Just looking at one particular burden, for  
12 example, we see that 38.7 percent of white eligible  
13 voters indicated that at least getting time off from  
14 work would be a problem, 40 percent of blacks, a high  
15 number of 54.2 percent of Latinos indicated that would  
16 be a problem.

17                  MR. SCOTT: So let's pause here, take a  
18 break, and then we'll pick right back up right there.

19                  THE WITNESS: Look for some tarantulas.

20                  (Break.)

21                  MR. SCOTT: All right. Back on the  
22 record.

23       **Q. (By Mr. Scott) Dr. Sanchez, right before**  
24 **breaking we identified one of the burdens that you had**  
25 **been able to relay and you identified a number of**

1                   MR. SCOTT: I apologize, Doctor. I  
2 don't bring those with me.

3                   THE WITNESS: Hey, no worries.

4                   MR. SCOTT: How about we digress for a  
5 moment on that and we'll come back and I'll write  
6 myself a note?

7                   MR. DUNN: I have it here.

8                   MR. SCOTT: Oh, you do. Okay.

9                   MR. DUNN: I'm just saving it to this  
10 thumb drive. I was going to go print it.

11                  MR. SCOTT: Oh, that's great. Tell you  
12 what, let's take a break.

13                  (Break.)

14                  MR. SCOTT: Back on the record.

15                  **Q. (By Mr. Scott) You have been handed by**  
16 **Mr. Dunn, who so kindly was able to print off Appendix**  
17 **A or Appendix B or both. Is that correct?**

18                  A. That's correct.

19                  **Q. And what is Appendix A?**

20                  A. Appendix A is our series of tables that  
21 correspond to the report.

22                  **Q. Okay. And Appendix B?**

23                  A. I didn't get Appendix B, but that's -- I  
24 believe that's the actual survey instrument.

25                  **Q. Okay. And so Appendix A contains the actual**

1 Q. Okay. And so those -- those -- the

2 **Applewhite case that was in Pennsylvania --**

3 A. Pennsylvania State case.

4 Q. -- the Wisconsin for the ACLU --

5 A. Correct.

6 Q. -- and this case are the only three cases

7 you've ever been retained in any way associated with  
8 law and being an expert?

9 A. With photo ID.

10 MR. SCOTT: Okay. We'll pick it up  
11 afterwards, because I'll clarify that.

12 (Break.)

13 MR. SCOTT: Okay. We're ready to go  
14 back on the record.

15 Q. (By Mr. Scott) When last we left off, you --  
16 I want to make sure that we've got a good record on  
17 anything you've been retained to be an expert witness  
18 for.

19 A. Got it.

20 Q. Either as a testifying or consulting witness,  
21 either in lawsuits filed in State or Federal Court or  
22 even just you've been hired by a lawyer. How many  
23 times have you been retained as an expert?

24 A. So the only one beyond the three that we've  
25 already identified was a redistricting case in New

1 **discrepancies, I guess, in the survey?**

2 A. What it's indicating is that where there were  
3 any -- luckily for us, very few -- cases where you  
4 don't have an exact match between what the sample  
5 numbers look like and the ACS, that's what you employ  
6 weight for.

7 **Q. So what were the discrepancies that you found  
8 that need to be weighted?**

9 A. Oh, man. I can't remember off the top of my  
10 head.

11 **Q. Are they identified anywhere in the report?**

12 A. I believe -- I believe they actually are in  
13 the rebuttal. I think one of the opposing experts  
14 attempted to identify those.

15 **Q. Did you identify them in your reports?**

16 A. I don't think that we did. I can look for  
17 you, though.

18 **Q. Sure. Thank you.**

19 A. I don't see any of those, sir.

20 **Q. Okay.**

21 MR. SCOTT: Is this is a good breaking  
22 point for lunch?

23 MR. DUNN: Fine with me.

24 THE WITNESS: Sounds great.

25 (Lunch recess.)

170

1 **you see that in parentheses?**

2 A. Uh-huh.

3 **Q. Would you mind reading that parenthetical?**

4 A. It says, Programming note: Update so that it  
5 is always within 60 days of survey field date.

6 **Q. And why was the update done?**

7 A. The survey was conducted over almost a month  
8 from the time it started until when it's finished.

9 **Q. And do you recall when the survey began?**

10 A. Yeah. It's here in the report somewhere.

11 MR. DUNN: Do you mind if I take a break  
12 and just print a second copy of the survey instrument  
13 that y'all keep tossing back and forth?

14 MR. SCOTT: Yeah.

15 MR. DUNN: Okay.

16 MR. SCOTT: No. That's fine.

17 MR. DUNN: Can I have your thumb drive  
18 back?

19 MR. SCOTT: Yes. I put it in my pocket.

20 We're off the record.

21 (Break.)

22 **Q. (By Mr. Scott) We now have in front of you a**  
23 **separate list of the actual survey questions that**  
24 **Mr. Dunn was kind enough to print out for us.**

25 THE WITNESS: Thank you, sir.